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August 4, 2025

VIA ECF

The Honorable Sarah L. Cave
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Room 1670
New York, NY 10007

Plaintiffs' request at ECF No. 71 is **GRANTED**. Consisting with the briefing schedule set forth in Judge Woods' order at ECF No. 56, on or before **August 29, 2025**, Plaintiffs shall file a single omnibus memorandum of law totaling no more than 12,500 words in opposition to both the KuCoin Defendants' Motion to Dismiss the Amended Complaint (ECF No. 65) and Chainalysis' Motion to Dismiss the Amended Complaint (ECF No. 68).

On or before **September 15, 2025**, the KuCoin Defendants and Chainalysis shall file separate 3,500-word reply briefs consistent with Local Rule 7.1(c). (ECF No. 56).

The Clerk of Court is respectfully directed to close ECF No. 71.

SO ORDERED. August 5, 2025


SARAH L. CAVE
United States Magistrate Judge

Re: *Reca v. Flashdot Limited f/k/a PhoenixFin Limited, et al.*,
Civil Action No.: 1:24-cv-06316-GHW-SLC (S.D.N.Y.)

Dear Magistrate Judge Cave:

We represent plaintiffs Sofia Reca and James K. Supples (“Plaintiffs”) in the above-referenced action. On July 29, 2025, defendants Peken Global Limited, Flashdot Limited f/k/a PhoenixFin Limited, Chun Gan, and Ke Tang (together, the “KuCoin Defendants”) filed their Motion to Dismiss Plaintiffs’ Amended Complaint (ECF No. 65), and defendant Chainalysis Inc. (“Chainalysis”) likewise filed its Motion to Dismiss the Amended Complaint (ECF No. 68).¹

In accordance with Local Civil Rule 7.1(c) of the Joint Local Rules for S.D.N.Y. and E.D.N.Y., the KuCoin Defendants and Chainalysis each filed a memorandum of law in support of their motion totaling 8,746 and 4,317 words, respectively. *See* ECF No. 66; ECF No. 69. Pursuant to Local Civil Rule 7.1(c), Plaintiffs are entitled to submit a memorandum of law of up to 8,750 words in opposition to each motion for a total of 17,500 words.

Given the overlap of the arguments raised in each memorandum, as well as Plaintiffs’ allegations that the KuCoin Defendants and Chainalysis acted as an “enterprise” within the meaning of 18 U.S.C. §1961(4) (¶¶169-193)² and jointly agreed to engage in a common scheme and conspiracy (¶¶194-203), Plaintiffs respectfully submit that filing a single omnibus memorandum of law in opposition to both motions to dismiss will promote judicial economy, streamline the Court’s review and analysis of the issues presented in Defendants’ motions, conserve judicial (as well as the

¹ The KuCoin Defendants and Chainalysis are collectively referred to herein as “Defendants.”

² References to “¶¶” refer to the Amended Complaint (ECF No. 49).

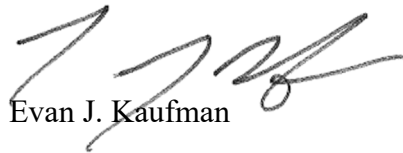
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parties’) resources, and mitigate unnecessary briefing. *See Readick v. Avis Budget Grp., Inc.*, 2014 WL 1683799, at *6 (S.D.N.Y. Apr. 28, 2014) (“[C]onsiderations of judicial economy are frequently viewed as relevant to the public interest, and, as noted, they weigh against the investment of court resources that may prove to have been unnecessary.”); *see also Albert v. Blue Diamond Growers*, 232 F. Supp. 3d 509, 513 (S.D.N.Y. 2017) (efforts to “conserve judicial resources and promote judicial economy” promote the “interests of non-parties and the public”). Accordingly, Plaintiffs respectfully request permission to file a single omnibus memorandum of law in opposition to both motions to dismiss, totaling no more than 12,500 words. Plaintiffs respectfully submit that this is a reasonable request, given that the KuCoin Defendants’ and Chainalysis’ memoranda of law consisted of 13,063 words collectively.

Plaintiffs have conferred with counsel for Defendants and they consent to the relief sought herein, provided that Defendants retain the right to file separate 3,500-word reply briefs consistent with Local Rule 7.1(c). Plaintiffs consent to Defendants’ request.

Respectfully submitted,



Evan J. Kaufman

cc: All Counsel of Record (via ECF)